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Attorneys for Plaintiff
GINA MADRID

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA – SAN JOSE

GINA MADRID,

Plaintiffs,

vs.

HAHN FAMILY WINES, ALEJANDRO
CORTEZ and DOES 1 through 100,

Defendants.

Case No. 5:20-cv-05401-NC

**ORDER GRANTING JOINT REQUEST
FOR CONDITIONAL DISMISSAL AND
VACATING ALL DEADLINES**

Trial Date: August 8, 2022

NOTICE OF CONDITIONAL SETTLEMENT AND JOINT STIPULATION

TO THE COURT, ALL PARTIES, AND COUNSEL OF RECORD: Plaintiff GINA MADRID (“Plaintiff”) and Defendants Hahn Family Wines and Alejandro Cortez (“Defendants”) have agreed to settle the above-captioned matter, subject to the completion of terms and conditions specified in the Settlement Agreement and General Release (“Agreement”). Pursuant to the terms of the Agreement, Plaintiff will request dismissal of this entire Action, with prejudice, upon satisfaction of the conditions set forth therein.

In light of this conditional settlement, and pursuant to Local Rule 6-2, the Parties, by and through their respective counsel, stipulate and agree as follows:

Whereas, the Parties have agreed to settle the matter in accordance with the terms set forth in the Agreement;

Whereas, the Parties expect such conditions of settlement (disbursement of settlement funds) to be completed within 60 days of the filing of this notice and stipulation;

Whereas, the Parties stipulate and jointly request an order conditionally dismissing the case, with leave to reinstate on or before 60 days for the purpose of proceeding with the litigation in the event settlement has not been completed prior to that date. In the event a request to reinstate the case is not filed and served on opposing counsel on or before the foregoing date, the dismissal will be with prejudice. The parties further request that the Court vacating all deadlines governing this case, including all upcoming court hearings.

IT IS SO STIPULATED.

Dated: May 11, 2022

JACKSON LEWIS P.C.

By: /s/ Mark S. Askanas
 Mark S. Askanas
 Robert Yang
 Attorneys for Defendant
 HAHN FAMILY WINES

1 Dated: May 11, 2022

GORDON REES SCULLY MANSUKHANI, LLP

2
3 By: /s/ John Drake Seger
4 John Drake Seger
5 Attorneys for Defendant
ALEJANDRO CORTES

6 *John Drake Seger, counsel for Co-Defendant
7 Alejandro Cortes, authorized submission of his e-
8 signature on this document in writing, by e-mail
dated May 11, 2022.

9 Dated: May 11, 2022

LAW OFFICES OF J.B. WORKMAN

10
11 By: /s/ Jeffrey Bennett Workman
12 Jeffrey Bennett Workman
13 Attorneys for Plaintiff
GINA MADRID

14 *Jeffrey Bennett, counsel for Plaintiff Gina Madrid,
15 authorized submission of his e-signature on this
16 document in writing, by e-mail dated May 11, 2022.

ORDER

IT IS HEREBY ORDERED that this case is dismissed without prejudice, with leave to reinstate on or before 60 days for the purpose of proceeding with the litigation in the event settlement has not been completed prior to that date. In the event a request to reinstate the case is not filed and served on opposing counsel on or before the foregoing date, the dismissal will be with prejudice.

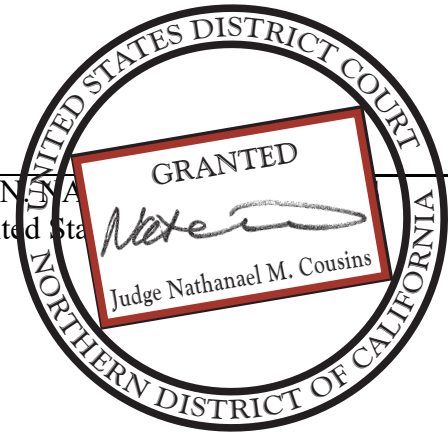
IT IS FURTHER ORDERED that all case deadlines are hereby vacated, including all upcoming hearings.

IT IS SO ORDERED.

Dated: May 11, 2022

By: _____

HONORABLE
United States



4879-8068-8671, v. 1